

EXHIBIT 15

DE-121

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): (949) 833-1066 (949) 833-1292 RICHARD L. HEATON, ESQ. CHEADLE, GARRETT & HEATON, LLP 4041 MacARTHUR BLVD., SUITE 360 NEWPORT BEACH, CA 92660		FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF RIVERSIDE DEC 12 2003 K. RANIERI
ATTORNEY FOR (Name): DAVID TOWNSEND		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 4050 MAIN STREET MAILING ADDRESS: CITY AND ZIP CODE: RIVERSIDE, CALIFORNIA 92501-3704 BRANCH NAME: RIVERSIDE PROBATE DIVISION		
ESTATE OF (Name): EDWARD B. TOWNSEND		
DECEDENT		CASE NUMBER: 084914
NOTICE OF PETITION TO ADMINISTER ESTATE OF (Name): ESTATE OF EDWARD B. TOWNSEND		

- To all heirs, beneficiaries, creditors, contingent creditors, and persons who may otherwise be interested in the will or estate, or both, of (specify all names by which decedent was known): **EDWARD B. TOWNSEND**
- A PETITION FOR PROBATE has been filed by (name of petitioner): **HELEN TOWNSEND McDONALD** in the Superior Court of California, County of (specify): **RIVERSIDE**
- THE PETITION FOR PROBATE requests that (name): **HELEN TOWNSEND McDONALD** be appointed as personal representative to administer the estate of the decedent.
- ☐ THE PETITION requests the decedent's will and codicils, if any, be admitted to probate. The will and any codicils are available for examination in the file kept by the court.
- ☒ THE PETITION requests authority to administer the estate under the Independent Administration of Estates Act. (This authority will allow the personal representative to take many actions without obtaining court approval. Before taking certain very important actions, however, the personal representative will be required to give notice to interested persons unless they have waived notice or consented to the proposed action.) The independent administration authority will be granted unless an interested person files an objection to the petition and shows good cause why the court should not grant the authority.
- A HEARING on the petition will be held on

a. Date: **JANUARY 27, 2004** Time: **9:00 A.M.** Dept.: **1** Room:

b. Address of court: ☒ same as noted above ☐ other (specify):

- IF YOU OBJECT to the granting of the petition, you should appear at the hearing and state your objections or file written objections with the court before the hearing. Your appearance may be in person or by your attorney.
- IF YOU ARE A CREDITOR or a contingent creditor of the deceased, you must file your claim with the court and mail a copy to the personal representative appointed by the court within four months from the date of first issuance of letters as provided in Probate Code section 9100. The time for filing claims will not expire before four months from the hearing date noticed above.
- YOU MAY EXAMINE the file kept by the court. If you are a person interested in the estate, you may file with the court a Request for Special Notice (form DE-154) of the filing of an inventory and appraisal of estate assets or of any petition or account as provided in Probate Code section 1250. A Request for Special Notice form is available from the court clerk.
- ☐ Petitioner ☒ Attorney for petitioner (name): **RICHARD L. HEATON, ESQ.**
(Address): **GARRETT & HEATON, LLP**
4041 MacARTHUR BOULEVARD, SUITE 360
NEWPORT BEACH, CA 92660
(Telephone): **(949) 833-1066**

(SIGNATURE OF ☐ PETITIONER ☒ ATTORNEY FOR PETITIONER)

NOTE: If this notice is published, print the caption, beginning with the words NOTICE OF PETITION, and do not print the information from the form above the caption. The caption and decedent's name must be printed in at least 8-point type and the text in at least 7-point type. Print the case number as part of the caption. Print items preceded by a box only if the box is checked. Do not print the italicized instructions in parentheses, the paragraph numbers, the mailing information, or the material on the reverse.

(Continued on reverse)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state, number, and address): RICHARD L. HEATON, ESQ. SBN: 71149 GARRETT & HEATON, LLP 4041 MacARTHUR BLVD., SUITE 360 NEWPORT BEACH, CA 92660		127-041 DE-111 FOR COURT USE ONLY	
TELEPHONE NO.: (949) 833-1066 FAX NO. (Optional): (949) 833-1292 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): HELEN TOWNSEND McDONALD		<div style="font-size: 2em; font-weight: bold; margin: 0;">FILED</div> <div style="font-weight: bold; margin: 5px 0;">SUPERIOR COURT OF CALIFORNIA</div> <div style="font-weight: bold; margin: 0 0;">COUNTY OF RIVERSIDE</div> <div style="font-size: 1.5em; font-weight: bold; margin: 10px 0;">DEC 08 2003</div> <div style="font-size: 2em; font-weight: bold; margin: 10px 0;">D8</div>	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 4050 MAIN STREET MAILING ADDRESS: CITY AND ZIP CODE: RIVERSIDE, CALIFORNIA 92501-3704 BRANCH NAME: RIVERSIDE PROBATE DIVISION			
ESTATE OF (Name): EDWARD B. TOWNSEND			
DECEDENT			
PETITION FOR <input type="checkbox"/> Probate of Will and for Letters Testamentary <input type="checkbox"/> Probate of Will and for Letters of Administration with Will Annexed <input checked="" type="checkbox"/> Letters of Administration <input type="checkbox"/> Letters of Special Administration <input type="checkbox"/> with general powers <input checked="" type="checkbox"/> Authorization to Administer Under the Independent Administration of Estates Act <input type="checkbox"/> with limited authority		CASE NUMBER: <div style="text-align: center; font-weight: bold;">084914</div> HEARING DATE: <div style="text-align: center; font-weight: bold;">1-27-04</div> DEPT.: <div style="text-align: center; font-weight: bold;">1</div> TIME: <div style="text-align: center; font-weight: bold;">9:00 AM</div>	

1. Publication will be in (specify name of newspaper):
 a. ☒ Publication requested. b. ☐ Publication to be arranged.
2. Petitioner (name of each): **HELEN TOWNSEND McDONALD** requests
 a. ☐ decedent's will and codicils, if any, be admitted to probate.
 b. ☒ (name): **HELEN TOWNSEND McDONALD**
 be appointed (1) ☐ executor (3) ☒ administrator
 (2) ☐ administrator with will annexed (4) ☐ special administrator ☐ with general powers
 and Letters issue upon qualification.
 c. ☒ that ☒ full ☐ limited authority be granted to administer under the Independent Administration of Estates Act.
 d. (1) ☐ bond not be required for the reasons stated in Item 4d.
 (2) ☒ \$ 300,000.00 bond be fixed. It will be furnished by an admitted surety insurer or as otherwise provided by law.
 (Specify reasons in Attachment 2 if the amount is different from the maximum required by Prob. Code § 8482.)
 (3) ☐ \$ 0.00 in deposits in a blocked account be allowed. Receipts will be filed. (Specify institution and location):
3. a. Estimated value of the estate for filing fee purposes (Complete in all cases. The estimated value of the estate is the fair market value of the real and personal property of the estate at the date of the decedent's death, without reduction for encumbrances. See Gov. Code, § 26827.):
 (1) ☒ Less than \$250,000 (6) ☐ At least \$1.5 million and less than \$2 million
 (2) ☐ At least \$250,000 and less than \$500,000 (7) ☐ At least \$2 million and less than \$2.5 million
 (3) ☐ At least \$500,000 and less than \$750,000 (8) ☐ At least \$2.5 million and less than \$3.5 million
 (4) ☐ At least \$750,000 and less than \$1 million (9) ☐ \$ 0.00
 (5) ☐ At least \$1 million and less than \$1.5 million * (Specify total estimated value of estate.)
 b. ☐ This petition is not the first petition for appointment of a personal representative with general powers filed in this proceeding. The first petition was filed on (date):
4. a. Decedent died on (date): **8/13/2003** at (place): **SAN BERNARDINO HOSPITAL**
 (1) ☒ a resident of the county named above.
 (2) ☐ a nonresident of California and left an estate in the county named above located at (specify location permitting publication in the newspaper named in item 1):
 b. Street address, city, and county of decedent's residence at time of death (specify): **26824 OLE LANE, ROMOLAND, RIVERSIDE COUNTY**

(Continued on reverse)

Page 1 of 3

ESTATE OF (Name): EDWARD B. TOWNSEND	CASE NUMBER:
DECEDENT	084914

4. c. Character and estimated value of the property of the estate for bond purposes:

(1) Personal property: \$ 119,900.00

(2) Annual gross income from

(a) real property: \$ 0.00

(b) personal property: \$ 50,000.00

Total: \$ 169,900.00

(3) Real property: \$ 130,000.00 (If full authority under the Independent Administration of Estates Act is requested, state the fair market value of the real property less encumbrances.)

- d. (1) ☐ Will waives bond. ☐ Special administrator is the named executor and the will waives bond.
 (2) ☐ All beneficiaries are adults and have waived bond, and the will does not require a bond. (Affix waiver as Attachment 4d(2).)
 (3) ☐ All heirs at law are adults and have waived bond. (Affix waiver as Attachment 4d(3).)
 (4) ☐ Sole personal representative is a corporate fiduciary or an exempt government agency.
- e. (1) ☒ Decedent died intestate.
 (2) ☐ Copy of decedent's will dated: ☐ codicils dated: are affixed as Attachment 4e(2).
 (Include in Attachment 4e(2) a typed copy of a handwritten will and a translation of a foreign language will.)
☐ The will and all codicils are self-proving (Prob. Code, § 8220).

f. Appointment of personal representative (check all applicable boxes):

(1) Appointment of executor or administrator with will annexed:

- (a) ☐ Proposed executor is named as executor in the will and consents to act.
 (b) ☐ No executor is named in the will.
 (c) ☐ Proposed personal representative is a nominee of a person entitled to Letters. (Affix nomination as Attachment 4f(1)(c).)
 (d) ☐ Other named executors will not act because of ☐ death ☐ declination ☐ other reasons (specify in Attachment 4f(1)(d)).

(2) Appointment of administrator:

- (a) ☐ Petitioner is a person entitled to Letters. (If necessary, explain priority in Attachment 4f(2)(a).)
 (b) ☒ Petitioner is a nominee of a person entitled to Letters. (Affix nomination as Attachment 4f(2)(b).)
 (c) ☒ Petitioner is related to the decedent as (specify): PETITIONER IS DECEDENT'S SISTER
 (3) ☐ Appointment of special administrator requested. (Specify grounds and requested powers in Attachment 4f(3).)

g. Proposed personal representative is a ☒ resident of California ☐ nonresident of California (affix statement of permanent address as Attachment 4g). ☐ resident of the United States ☐ nonresident of the United States.5. ☒ Decedent's will does not preclude administration of this estate under the Independent Administration of Estates Act.

6. a. The decedent is survived by (check at least one box in each of items (1)-(4)).

- (1) ☐ spouse ☒ no spouse as follows: ☒ divorced or never married ☐ spouse deceased
 (2) ☐ domestic partner ☒ no domestic partner (See Prob. Code, §§ 37(b), 6401(c), and 6402.)
 (3) ☒ child as follows: ☒ natural or adopted ☐ natural adopted by a third party ☐ no child
 (4) ☐ issue of a predeceased child ☒ no issue of a predeceased child

b. Decedent ☐ is ☒ is not survived by a stepchild or foster child or children who would have been adopted by decedent but for a legal barrier. (See Prob. Code, § 6454.)

7. (Complete if decedent was survived by (1) a spouse or domestic partner but no issue (only a or b apply), or (2) no spouse, domestic partner, or issue. Check the first box that applies):

- a. ☐ Decedent is survived by a parent or parents who are listed in item 9.
 b. ☐ Decedent is survived by issue of deceased parents, all of whom are listed in item 9.
 c. ☐ Decedent is survived by a grandparent or grandparents who are listed in item 9.
 d. ☐ Decedent is survived by issue of grandparents, all of whom are listed in item 9.
 e. ☐ Decedent is survived by issue of a predeceased spouse, all of whom are listed in item 9.
 f. ☐ Decedent is survived by next of kin, all of whom are listed in item 9.
 g. ☐ Decedent is survived by parents of a predeceased spouse or issue of those parents, if both are predeceased, all of whom are listed in item 9.
 h. ☐ Decedent is survived by no known next of kin.

ESTATE OF (Name): EDWARD B. TOWNSEND	CASE NUMBER:
DECEDENT	084914

8. (Complete only if no spouse or issue survived decedent.) Decedent ☐ had no predeceased spouse ☐ had a predeceased spouse who (1) ☐ died not more than 15 years before decedent owning an interest in **real property** that passed to decedent, (2) ☐ died not more than five years before decedent owning **personal property** valued at \$10,000 or more that passed to decedent, (3) ☐ neither (1) nor (2) apply. (If you checked (1) or (2), check only the first box that applies):

- a. ☐ Decedent is survived by issue of a predeceased spouse, all of whom are listed in item 9.
- b. ☐ Decedent is survived by a parent or parents of the predeceased spouse who are listed in item 9.
- c. ☐ Decedent is survived by issue of a parent of the predeceased spouse, all of whom are listed in item 9.
- d. ☐ Decedent is survived by next of kin of the decedent, all of whom are listed in item 9.
- e. ☐ Decedent is survived by next of kin of the predeceased spouse, all of whom are listed in item 9.

9. Listed below are the names, relationships, ages, and addresses, so far as known to or reasonably ascertainable by petitioner, of (1) all persons named in decedent's will and codicils, whether living or deceased; (2) all persons named or checked in items 2, 6, 7, and 8; and (3) all beneficiaries of a devisee trust in which the trustee and personal representative are the same person.

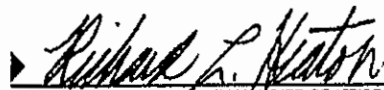
Name and Relationship	Age	Address
DAVID TOWNSEND, SON	ADULT	10101 AMIGO STREET NORTHRIDGE, CA 91324
KATHRYN GRIFFIN, DAUGHTER	ADULT	3841 GERTIN STREET HOUSTON, TX 77004
MICHAEL TOWNSEND, SON	ADULT	27307 EL PUENTE SUN CITY, CA 92586

☐ Continued on Attachment 9.

10. Number of pages attached: 1

Date: NOVEMBER 20, 2003

* (Signature of all petitioners also required. (Prob. Code, § 1020, California Rules of Court, rule 7.103).)



(SIGNATURE OF ATTORNEY)

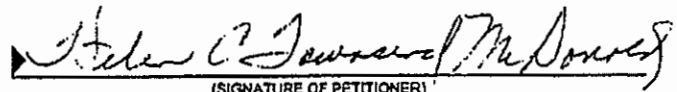
RICHARD L. HEATON, ESQ. SBN: 71149

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: NOVEMBER 20, 2003

HELEN TOWNSEND McDONALD

(TYPE OR PRINT NAME)



(SIGNATURE OF PETITIONER)

(TYPE OR PRINT NAME)

(SIGNATURE OF PETITIONER)

1 Richard L. Heaton, Esq. SBN: 71149
2 Garrett & Heaton, LLP
3 4041 MacArthur Blvd., Suite 360
4 Newport Beach, CA 92660
5 Telephone: (949) 833-1066
6 Teelcopier: (949) 833-1292

7 Attorneys for Petitioner,
8 Helen Townsend McDonald

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

MAR 05 2007
K. Rahlwes

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF RIVERSIDE, CENTRAL JUDICIAL DISTRICT**

11 **PARTIAL FAX FILING**

12 Re Estate of

13 Edward B. Townsend,

14 Deceased.

CASE NO. 084914

PETITION TO DETERMINE TITLE TO AND
REQUIRE TRANSFER OF PERSONAL
PROPERTY TO ESTATE
[Prob. C. §850(a)(2)(A)]

DATE:
TIME:
DEPT:

4-18-07
8:30
10

15
16 Petitioner, Helen Townsend McDonald, alleges:

17 1. Petitioner is the Personal Representative of the estate of Edward B.
18 Townsend (hereinafter "Ed") and is Ed Townsend's sister.

19 2. During the life of Ed Townsend, he had a close and loving relationship with
20 his sister, Helen McDonald. Ed was a talented musician who composed a substantial
21 catalog of songs which were sung by the likes of the famed American soul and Rhythm &
22 Blues singer, Marvin Gaye. Especially well known among his songs were Marvin Gaye's
23 1973 hit "Let's Get It On," along with his 1958 hit "For Your Love" which was covered by
24 the singing group of Peaches & Herb. Accordingly, the value of the catalog that Ed left
25 behind was quite substantial, and the songs are still so popular that the royalties each
26 year from the catalog approach half a million dollars.

27 3. In 1995, Ed approached his sister, Helen, and told her that he wished to sell
28 her a small portion of his catalog for the sum at that time of \$10,000. At that time, the

1 5. Ed died on August 13, 2003, of a heart attack and was a resident of Sun City
2 in Riverside County, where his sister was also a resident. They had maintained a close
3 relationship right through the moment of his death.

4 6. Ed died intestate, leaving three natural children as the heirs of his estate:
5 namely, Edward David Townsend, Clef Michael Townsend, and Kathryn Griffin. As is
6 shown by the facsimile transmittal dated August 19, 2002, from Ed to David Pullman, a
7 copy of which is attached hereto as Exhibit "C," Mr. Pullman had extensive information
8 about the underlying nature of the catalog. Furthermore, as is shown by the e-mail sent
9 Monday, September 9, 2002, from Ed to David Pullman, a copy of which is attached
10 hereto as Exhibit "D," Mr. Pullman had offered "a couple of million dollars" for the catalog
11 in 2002, which would make 10% of the catalog worth \$200,000.00 even based on his
12 prior offer. In addition, because of activity after that date, the catalog increased further in
13 value and is worth even more presently. After Ed's death, each of the foregoing three
14 beneficiaries was shown the letter agreement and affirmed and ratified their acceptance
15 of it and agreed that it should be upheld as valid in the context of administering the
16 estate. Furthermore, declarations were filed with the court in this action on March 29,
17 2006, by KATHRYN GRIFFIN and CHERRIGALE TOWNSEND, who is the successor in
18 interest to EDWARD DAVID TOWNSEND who died during the estate administration;
19 those declarations, once again, confirm their acceptance of the letter agreement and their
20 desires that it be considered valid and upheld by this court. Copies of those declarations
21 are attached hereto as Exhibits "E" and "F," respectfully.

22 7. Michael affirmed his acceptance of it and agreed that Helen should have the
23 10% of the catalog that Ed had failed to transfer to her.

24 8. After Michael affirmed the agreement, he was contacted by a certain David
25 Pullman, who offered to purchase his interest in the estate. Mr. Pullman had, prior to Ed's
26 death, engaged in intense negotiations to purchase Ed's catalog and had extensive
27 knowledge of the catalog. Mr. Pullman knew what the catalog was producing by way of
28 royalty income and, as an expert in the field of royalty interests, well knew the substantial

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1 the estate but that that did not include the interest that went to Helen, since he had
2 already committed to honor his father's wishes.

3 10. Petitioner, Helen Townsend McDonald, requests that pursuant to Probate
4 Code §850(a)(2)(A) this Court determine that she, as a Personal Representative, execute
5 the terms of the aforesaid agreement and transfer to herself as a claimant, the aforesaid
6 interest of "10% of Ed Townsend Productions and all things involved therewith," and
7 specifically to include but not be limited to 10% of Ed Townsend's music catalog. In
8 addition, she requests that the terms of the letter agreement be honored in that she
9 would also have the right to 25% of the net profit earned (although to date there has been
10 no net profit) from the two songs "Somehow My Fear (Just Disappear)" and "In The
11 Morning (We'll Know)" as well as 15% of the ownership of the copyrights of those songs.
12 Such ownership would begin as set forth in the letter agreement starting January 11,
13 1995, and would include all the royalties paid after that date

14 WHEREFORE, Petitioner prays for an order enforcing the January 11, 1995 letter
15 agreement as follows:

16 1. 25% of the royalties earned after January 11, 1995 from the two songs.
17 "Somehow My Fear (Just Disappear)" and "In The Morning (We'll Know)" be paid to her
18 and that she be granted 15% owner in the copyrights for those two songs. In addition,
19 that she be adjudged a 10% owner of Ed Townsend Productions and all of its assets,
20 including but not limited to the music catalog of the decedent, Edward B. Townsend, and
21 that title to the foregoing assets be ordered to be conveyed by her, as Personal
22 Representative of the estate, to her, as an individual, and for such other relief as this
23 Court deems appropriate.

24 Dated: March 1, 2007


HELEN TOWNSEND McDONALD

26 GARRETT & HEATON, LLP

27 
28 RICHARD L. HEATON

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Attorneys for Petitioner,
 Helen Townsend McDonald

FILED
 SUPERIOR COURT OF CALIFORNIA
 COUNTY OF RIVERSIDE

DEC 20 2005

SUPERIOR COURT OF CALIFORNIA

COUNTY OF RIVERSIDE

FAX FILING

Re Estate of

EDWARD B. TOWNSEND,

Decedent.

CASE NO. 084914

**FIRST AND FINAL ACCOUNT AND REPORT
 OF STATUS OF ADMINISTRATION AND
 PETITION FOR SETTLEMENT THEREOF; FOR
 ALLOWANCE OF STATUTORY ATTORNEY'S
 AND ADMINISTRATOR'S COMPENSATION;
 FOR EXTRAORDINARY ATTORNEY'S AND
 ADMINISTRATOR'S COMPENSATION; FOR
 REIMBURSEMENT OF COSTS ADVANCED;
 AND FOR FINAL DISTRIBUTION**

[Prob. C. §§1060 et. seq., 10800, 10810, 10811,
 12201]

DATE: 3-1-06
 TIME: 8:30 AM
 DEPT: 10 ac

HELEN TOWNSEND McDONALD, the administrator of the estate of Edward B. Townsend, respectfully presents her First and Final Account and Report of Status of Administration and Petition for Settlement Thereof, for Allowance of Statutory Attorney's and Administrator's Compensation; for Extraordinary Attorney's and Administrator's Compensation; for Reimbursement of Costs Advanced; and for Final Distribution, as follows.

Handwritten:
 Bond \$300,000
 7250,000

1 of this accounting period on December 1, 2005, is \$1,541,023.00 of which
 2 \$475,000.00 is cash. A list of the property on hand is attached as Schedule F to
 3 Exhibit "A" and incorporated by this reference.

4 15. **Cash Invested in Interest-Bearing Accounts** – During the period of
 5 the accounting, the Petitioner kept all cash, other than such amounts as were
 6 reasonably necessary for the estate's administration, invested in interest-bearing
 7 accounts or other investments authorized by law.

8 16. **Graduated Filing Fee Adjustment** – The corrected filing fee
 9 (\$2,276.00) is greater than the estimated filing fee paid (\$280.00). The difference
 10 (\$1,996.00) has been paid to the clerk of this court. The Graduated Filing Fee
 11 Information schedule and a true and correct copy of the receipt for that payment is
 12 attached as Exhibit "C." PD 12/1/06

13 17. **Paternity** – The decedent had three children: Edward David
 14 Townsend, Clef Michael Townsend, and Kathryn Griffin. Edward David Townsend
 15 and Clef Michael Townsend were children born of the marriage between decedent
 16 and Cherrigale Townsend. Kathryn Griffin was born out of wedlock to the decedent
 17 and an unknown mother. The reason that the mother is unknown is that the records
 18 have been sealed in Los Angeles County. However, it is known personally to Clef
 19 Michael Townsend and was know to Edward David Townsend that Kathryn Griffin
 20 was delivered by Dr. David Owens, and this was also known by Cherrigale
 21 Townsend, the mother of Clef Michael Townsend and Edward David Townsend. Dr.
 22 David Owens' name was shown on the birth certificate as the delivering doctor and
 23 Dr. Owens confirmed that Kathryn Griffin was, indeed, the natural child of Edward
 24 B. Townsend. Furthermore, both Clef Michael Townsend and Cherrigale Townsend,
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 26
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1 who is the personal representative of Edward David Townsend's estate and the
 2 former spouse of Edward B. Townsend, have specifically stated that they wish to
 3 acknowledge Kathryn Griffin as the natural child and heir of Edward B. Townsend. It
 4 is therefore requested of this Court that it confirm the paternity of Kathryn Griffin as
 5 the daughter of Edward B. Townsend for purposes of inheriting her one-third
 6 intestate share of Edward B. Townsend's estate.

8 18. **Loan to Clef Michael Townsend** - On January 16, 2004, Sharon J.
 9 Thornton loaned to beneficiary, Clef Michael Townsend, the amount of \$5,000.00.
 10 Attached hereto as Exhibit "D" is an Assignment of Interest in Estate and the related
 11 promissory note. Accordingly, from the distributive share of the distribution that
 12 would otherwise go to Clef Michael Townsend, there should be deducted \$5,000.00
 13 plus interest thereon at the rate of seven percent (7%) simple interest from January
 14 16, 2004 until the date of payment, and that should be paid to Sharon J. Thornton in
 15 full payment of her loan and in exchange for her release of the Assignment of
 16 Interest in Estate.

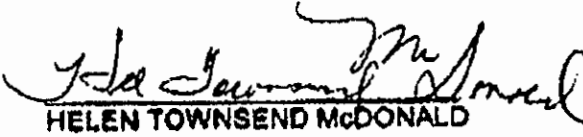
18 19. **Death of Edward David Townsend** - During the estate's settlement,
 19 on October 27, 2005, Edward David Townsend deceased. A diligent search was
 20 made of his home and no will was found for him. He died an unmarried man without
 21 children. His mother, Cherrigale Townsend, is in the process of petitioning the Court
 22 for Letters of Administration of his estate. Accordingly, his share should be paid to
 23 his estate.

25 20. **Eviction Proceedings and Attorney's Fees** - The estate owned
 26 property at 19446 Wyandotte Street in Reseda, California. At the time of the
 27 Decedent's death, there were non-rent paying tenants in the property. Attorney
 28

1 Griffin, Estate of Edward David Townsend, and either David Pullman or Clef
2 Michael Townsend, depending on the Court's decision regarding the assignment of
3 Clef Michael Townsend's interest.

4
5 12. For such other and further orders as the Court may deem proper.

6
7 Dated: Dec. 16, 2005

8 
HELEN TOWNSEND McDONALD
Petitioner

9
10 GARRETT & HEATON, LLP

11
12 By: 
13 RICHARD L. HEATON,
14 Attorney for Petitioner

15
16 **VERIFICATION**

17
18 I, HELEN TOWNSEND McDONALD, am the petitioner in the above-entitled
19 matter. I have read the foregoing FIRST AND FINAL ACCOUNT AND REPORT OF
20 STATUS OF ADMINISTRATION AND PETITION FOR SETTLEMENT THEREOF; FOR
21 ALLOWANCE OF STATUTORY ATTORNEY'S AND ADMINISTRATOR'S COMPEN-
22 SATION; FOR EXTRAORDINARY ATTORNEY'S AND ADMINISTRATOR'S COMPENSA-
23 TION; FOR REIMBURSEMENT OF COSTS ADVANCED; AND FOR FINAL
24 DISTRIBUTION and know the contents thereof. The petition is true of my knowledge,
25 except as to those matter that are stated on information and belief, and as to those
26 matters, I believe them to be true.
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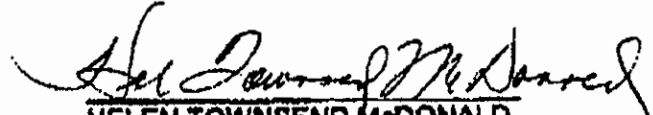
FIRST & FINAL ACCT. & REPT. OF STATUS OF ADMIN.; PET FOR ITS SETTLEMENT, FOR
COMP. & COSTS REIMB.; FOR FINAL DISTRIBUTION

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I declare under penalty of perjury under the laws of the State of California
that the foregoing is true and correct.

Executed on Dec. 16, 2005 at Sun City, California.


HELEN TOWNSEND McDONALD

14

FIRST & FINAL ACCT. & REPT. OF STATUS OF ADMIN.; PET FOR ITS SETTLEMENT, FOR
COMP. & COSTS REIMB.; FOR FINAL DISTRIBUTION

1 HAROLD S. NELSON
Attorney at Law
2 State Bar # 77565
24422 Avenida de la Carlota, Suite 200
3 Laguna Hills, California 92653
Phone: (949) 770-6788
4 Fax: (949) 768-6402
5 Attorney for Vilmore J. Schexnader

6
7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF RIVERSIDE

10
11 RE ESTATE OF:) CASE NO. RIP 084914
12 EDWARD B. TOWNSEND,)
13) DATE: May 31, 2006
14 Decedent.) TIME: 8:30 A.M.
15) DEPT: 10AC
16)
17) DECLARATION OF KATHRYN
18) GRIFFIN
19)

20 I, Kathryn Griffin, also known as Kathryn Griffin Townsend,
21 declare as follows:

22 1. I am the daughter of Edward B. Townsend, deceased.

23 2. I am also a half-sister of Clef Michael Townsend. I
24 submit this declaration in support of an action being taken to
25 set aside the transfer of the inheritance of Clef Michael
26 Townsend to David Pullman and Structured Asset Sales, LLC in
27 approximately June of 2004. Clef Michael Townsend has told me
28 that he did not read the document he signed and did not
understand that he was transferring his entire inheritance
interest.

3. Approximately one year ago I was also contacted by
David Pullman. He wanted to purchase my interest in my father's

1 catalog of music and offered me \$300,000. I believed this offer
 2 was less than the true value of the music. I refused to accept
 3 his offer. He continued to call me over a period of
 4 approximately six months. His calls became harassment as he
 5 aggressively and persistently tried to convince me to sell to
 6 him. Here are some of his statements: "You know you need some
 7 money now." "I'll take care of you." He knew I was a recovering
 8 drug and alcohol abuser like my brother Michael and continued to
 9 try to persuade me to sell to him.

10 4. Later in the year, after Hurricane Katrina, he
 11 contacted me and said he knew I needed money and I should sell.
 12 I felt very pressured by him. However, my father had told me
 13 that he wanted us to keep his catalog of music in the family. I
 14 also believed his offer of \$300,000 for my interest in the
 15 catalog of music was very inadequate.

16 5. As a beneficiary daughter of the decedent and one
 17 familiar with my father's music, it is my opinion that the
 18 payment by David Pullman and Structured Asset Sales, LLC of
 19 \$100,000 for my brother's inheritance was grossly inadequate.

20 6. I consent to the appointment of Vilmore J. Schexnader
 21 as conservator of the estate of my brother Clef Michael Townsend.

22 I have personal knowledge of the above and, if sworn
 23 to, could testify competently thereto. I declare under penalty
 24 of perjury pursuant to the laws of the State of California that
 25 the foregoing is true and correct.

26 Executed this 4 day of ^{April} ~~March~~, 2006, at Houston, Texas.

27 
 28 KATHRYN GRIFFIN

FROM : Council Member Peter Br
03/28/2006 23:17 S J402

FAX NO. : 7132473519

Mar. 29 2006 04:30PM P2

LAWOFFICE

PAGE 03/04

1 HAROLD S. NELSON
Attorney at Law
2 State Bar # 77565
24422 Avenida de la Carlota, Suite 200
3 Laguna Hills, California 92653
Phone: (949) 770-6788
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5 Attorney for Vilmore J. Scheemader
6
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF RIVERSIDE
10

11 RE ESTATE OF:)	CASE NO. RIP 084914
)	
12 EDWARD B. TOWNSEND,)	DATE: April 6, 2006
)	TIME: 8:30 A.M.
13)	DEPT: 10AC
Decedent.)	
14)	DECLARATION OF KATHRYN
)	GRIFFIN
15)	

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17 declare as follows:

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25 understand that he was transferring his entire inheritance
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FROM : Council Member Peter B...
03/28/2006 23:17 9... 402

FAX NO. : 7132473519

LAWOFFICE

Mar. 29 2006 04:20PM P3

PAGE 04/04

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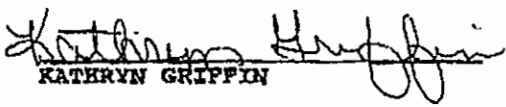
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13 that he wanted us to keep his catalog of music in the family. I
14 also believed his offer of \$300,000 for my interest in the
15 catalog of music was very inadequate.

16 5. As a beneficiary daughter of the decedent and one
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18 payment by David Pullman and Structured Asset Sales, LLC of
19 \$100,000 for my brother's inheritance was grossly inadequate.

20 6. I consent to the appointment of Vilmore J. Schenader
21 as conservator of the estate of my brother Clef Michael Townsend.

22 I have personal knowledge of the above and, if sworn
23 to, could testify competently thereto. I declare under penalty
24 of perjury pursuant to the laws of the State of California that
25 the foregoing is true and correct.

26 Executed this 29th day of March, 2005, at Houston, Texas.

27 
28 KATHRYN GRIFFIN

2/14/2006
9:16 AMGARRETT & HEATON, LLP
Pre-Bill Worksheet

Page 27

MCDONALD/TOWNSEND.002:HELEN TOWNSEND MCDONALD (continued)

Date ID	Professional Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/29/2004 96660	RLH LEGAL TELEPHONE CALL WITH HELEN REGARDING PATERNITY ISSUES TO GET ADEQUATE ASSURANCE THAT KATHRYN GRIFFIN REALLY IS THE HEIR OF ED TOWNSEND	400.00	0.30	120.00	Billable
11/2/2004 96842	RLH LEGAL LENGTHY TELEPHONE CALL WITH KATHY GRIFFIN REGARDING HER PATERNITY AND PROOF THEREOF AND VARIOUS ELEMENTS OF HER BACKGROUND INCLUDING WHO HER MOTHER MIGHT BE AND THE CIRCUMSTANCES OF HER ADOPTION AND ADVICE TO HER REGARDING ADVICE IN THIS REGARD	400.00	0.70	280.00	Billable
TOTAL	Billable Fees		4.90		\$1,960.00
Total of billable expense slips					\$0.00
				Amount	Total
Total of Fees (Time Charges)					\$1,960.00
Total of Costs (Expense Charges)					\$0.00
Total new charges					\$1,960.00
Total New Balance					\$1,960.00

Professional Summary

Professional	Rate	Hours	Charges	Slip Value	Adjustment
RLH	400.00	4.60	\$1,840.00	\$1,840.00	0.00
TBG	400.00	0.30	\$120.00	\$120.00	0.00

11/20
P201

Toni Eggebraaten, Esq. (SBN 164351)
 77-564A Country Club Drive, #191
 Palm Desert, CA 92211
 Telephone: (760) 772-4292
 Facsimile: (760) 772-4293

Attorney for Riverside County
 Public Administrator

FILED
 SUPERIOR COURT OF CALIFORNIA
 COUNTY OF RIVERSIDE

SEP 25 2008

[Signature]

SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

In the Matter of the Estate of) Case No. RIP 084914
)
EDWARD B. TOWNSEND,) [REDACTED] ORDER GRANTING EX
) PARTE APPLICATION FOR APPROVAL
) OF SCHEDULE OF DISTRIBUTION
Deceased.)
)
) Date: September 25, 2008
) Time: 10:00 a.m.
) Dept: P201

Riverside County Public Administrator, as administrator of the estate of Edward B. Townsend, deceased, having filed his Ex Parte Application For Approval of Schedule of Distribution, and good cause appearing therefor,

IT IS ORDERED AND ADJUDGED THAT:

1. The "Schedule N: Proposed Distributions," as incorporated in the amended final accounting that has previously been approved and settled by the Court, accurately sets out the

1 distributions that were to be made pursuant to the order entered
2 in this matter on August 14, 2008. In addition, the court having
3 now ruled on the petition for additional extraordinary fees
4 requested by Garrett & Heaton, LLC, and the parties having
5 stipulated that the estate should pay attorney fees of \$3,873.50
6 incurred by beneficiary Structured Asset Sales, LLC in opposition
7 to that petition, the special reserve of \$59,000 created to cover
8 the petition by Garrett & Heaton, LLC for additional extraordinary
9 fees may now be distributed. Accordingly, the administrator is
10 authorized and ordered to make distribution consistent with the
11 "Schedule N: Proposed Distributions" incorporated in the amended
12 final accounting and, further, to distribute the \$59,000 special
13 reserve shown therein. Such distribution shall include the
14 following distributions, offsets and adjustments:

15
16 **A. As to Structured Asset Sales, LLC, assets valued**
17 **at \$125,867.89, calculated as follows:**

18 i. The sum of \$67,499.83, representing
19 distribution of 33-1/3 percent of the balance of cash in the net
20 estate at the conclusion of the accounting period;

21 ii. The additional sum of \$2,440.84 reflecting
22 the beneficiary's one-third interest in the income accruing to the
23 estate on the 10 percent interest in decedent's Music Catalog
24 retained by the estate during the accounting period ending June 9,
25 2008;

26 iii. Distribution shall be reduced by the sum of
27 \$4,702.41 reflecting a prior partial assignment of the assignor's
28 interest in the estate;

1 iv. An equalizing payment of \$25,629.63 for
2 additional sums owing on prior preliminary distributions; and

3 v. Distribution of an additional 3-1/3% interest
4 in decedent's Music Catalog with a carry value of \$35,000.00.
5 Combined with a prior preliminary distribution of a 30% interest,
6 this further distribution will result in Structured Asset Sales,
7 LLC holding a total 33-1/3% interest in the Music Catalog.

8
9 B. As to Helen Townsend McDonald, assets valued at
10 \$273,712.90, calculated as follows:

11 i. The sum of \$13,499.97, representing
12 distribution of 6-2/3 percent of the balance of cash in the net
13 estate at the conclusion of the accounting period;

14 ii. The additional sum of \$4,881.67 reflecting
15 her two-thirds interest in the income accruing to the estate on
16 the 10 percent interest in decedent's Music Catalog retained by
17 the estate during the accounting period ending June 9, 2008;

18 iii. An equalizing payment of \$51,259.26 for sums
19 owing consistent with prior preliminary distributions made to
20 other beneficiaries;

21 iv. Distribution of a 6-2/3% interest in
22 decedent's Music Catalog with a carry value of \$70,000.00;

23 v. The sum of \$67,036.00 assigned by Kathryn
24 Griffin Townsend; and

25 vi. The sum of \$67,036.00 assigned by Cherrigale
26 Townsend, the personal representative of the Estate of David
27 Townsend.

1 C. As to Kathryn Griffin Townsend, a negative balance
2 of <\$6,786.15>, calculated as follows:

3 i. Distribution of decedent's personal property,
4 held at an appraised carry value of \$500.00;

5 ii. The sum of \$60,249.85, representing 30
6 percent of the balance of cash in the net estate at the end of the
7 accounting period, less an offset of \$500.00 for the in-kind
8 distribution of the personal property;

9 iii. Less the sum of \$67,036.00 previously
10 assigned to Helen Townsend McDonald. Deduction of this sum
11 results in a negative balance owed to the estate, which balance
12 shall be repaid out of the beneficiary's share of the unused
13 portion of the reserve.
14

15 D. As to Cherrigale Townsend, Personal Representative
16 of the Estate of David Townsend, a negative balance of
17 <\$6,286.15>:

18 i. The sum of \$60,749.85, representing 30
19 percent of the balance of cash in the net estate at the end of the
20 accounting period;

21 ii. Less the sum of \$67,036.00 previously
22 assigned to Helen Townsend McDonald. Deduction of this sum results
23 in a negative balance owed to the estate, which balance shall be
24 repaid out of the beneficiary's share of the unused portion of the
25 reserve.
26

27 2. Additionally, the Court now having ruled on the request
28 for extraordinary fees to be paid to Garrett & Heaton, LLP, the

1 administrator may disburse the additional sum of \$59,000.00,
 2 previously set aside as a reserve for said fees, as follows:

3 A. Garrett & Heaton, LLP has received the sum of
 4 \$25,749.75, representing final payment for all services rendered
 5 with respect to this estate and/or its administrator(s).

6 B. The sum of \$3,873.50 shall be paid to Horspool &
 7 Parker, APC, counsel for Structured Asset Sales, LLC, as
 8 compensation for its services in opposing the petition by Garrett
 9 & Heaton, LLP for additional extraordinary fees;

10 C. The sum of \$29,376.75 (the balance of the special
 11 \$59,000 reserve) shall be distributed as follows:

12 i. 33-1/3% to Structured Asset Sales, LLC
 13 (\$9,792.25);

14 ii. 30% to Kathryn Griffin Townsend (\$8,813.03),
 15 to first be applied toward the negative balance owed to the estate
 16 as referenced above;

17 iii. 30% to Cherrigale Townsend, Personal
 18 Representative of the Estate of David Townsend (\$8,813.03), to
 19 first be applied toward the negative balance owed to the estate as
 20 referenced above; and

21 iv. 6-2/3% to Helen Townsend McDonald
 22 (\$1,958.44).

23
 24 3. The administrator shall instruct all royalty payors
 25 included in decedent's Music Catalog to hereafter make
 26 distribution of all income as follows:

27 A. 30% to Kathryn Griffin Townsend;
 28

1 B. 30% to Cherrigale Townsend, Personal,
2 Representative of the Estate of David Townsend;

3 C. 33-1/3% to Structured Asset Sales, LLC; and

4 D. 6-2/3% to Helen Townsend McDonald.

5
6 4. Any income paid to the administrator after the
7 accounting period ending June 9, 2008 which accrued on the 10
8 percent interest in the Music Catalog previously held by the
9 estate shall be distributed one-third to Structured Asset Sales,
10 LLC and two-thirds to Helen Townsend McDonald.

11
12 5. Any other estate income or assets paid to or received
13 by the administrator after the accounting period ending June 9,
14 2008, shall be distributed as follows:

15 A. 30% to Kathryn Griffin Townsend

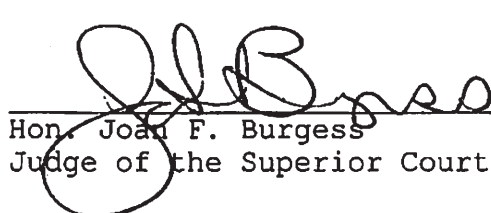
16 B. 30% to Cherrigale Townsend, Personal
17 Representative of the Estate of David Townsend;

18 C. 33-1/3% to Structured Asset Sales, LLC; and

19 D. 6-2/3% to Helen Townsend McDonald.

20
21 6. This Order supplements, but does not supersede, the
22 order entered in this matter on August 14, 2008.

23
24 DATED: 09-25-2008

25 
26 Hon. Joan F. Burgess
27 Judge of the Superior Court
28